

U.S. DISTRICT COURT
DISTRICT OF VERMONT
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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

UNITED STATES OF AMERICA,

v.

Criminal No. 2:07-CR-43

JOSE MANUEL GALDAMEZ-SERRANO,

NORVIN GONZALEZ-MORALES,

a/k/a "Chico,"

EMMANUEL ANTONIO GALDAMEZ,

RUBEN ALONZO DAMAS-HERNANDEZ,

a/k/a "Alex," and

JATINDER SINGH,

a/k/a "Vina,"

Defendants.

SECOND SUPERSEDING INDICTMENT

COUNT ONE

The Grand Jury charges:

THE CONSPIRACY AND ITS OBJECTS

1. From in or about April 2004, to in or about February 2007, in the District of Vermont and elsewhere, the defendants, JOSE MANUEL GALDAMEZ-SERRANO, NORVIN GONZALEZ-MORALES, a/k/a "Chico," EMMANUEL ANTONIO GALDAMEZ, RUBEN ALONZO DAMAS-HERNANDEZ, a/k/a "Alex," and JATINDER SINGH, a/k/a "Vina," did conspire with each other and with others known and unknown to the Grand Jury

(A) to violate 8 U.S.C. § 1324(a)(1)(A)(i), namely, knowing that a person is an alien, to bring to or attempt to bring to the United States in any manner whatsoever such person at a place other than a designated port of entry or place other than as designated by the Commissioner, regardless of whether such alien had received prior official authorization to come to, enter, or reside in the United States and regardless of any future official action which may be

taken with respect to such alien.

(B) to violate 8 U.S.C. § 1324(a)(1)(A)(ii), namely, knowing or in reckless disregard of the fact that an alien had come to, entered, or remained in the United States, in violation of law, to transport or move or attempt to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law.

2. It was the object of the conspiracy that the defendants and other conspirators, who collectively made up the GALDAMEZ organization, would charge fees to persons who lacked permission to enter the United States in exchange for assisting them to enter the United States illegally. The GALDAMEZ organization would then arrange for the transportation of the aliens across the border into the United States, and to their ultimate destination within the United States. The members of the GALDAMEZ organization used the fees charged to the illegal aliens to unjustly enrich themselves and fund their illegal operations.

MANNER AND MEANS OF THE CONSPIRACY

3. Among the means employed by the conspirators in the course of committing the crimes involved in Count One were the following:

(A) The GALDAMEZ organization was principally made up of members of the GALDAMEZ family. The GALDAMEZ organization specialized in illegally smuggling people across the Canadian border into the United States. JOSE MANUEL GALDAMEZ-SERRANO is the patriarch of the family. NORVIN GONZALEZ-MORALES, a/k/a "Chico," is the step-son and son-in-law of JOSE MANUEL GALDAMEZ-SERRANO. EMMANUEL ANTONIO GALDAMEZ is the son of JOSE MANUEL GALDAMEZ-SERRANO. RUBEN DAMAS-HERNANDEZ is the son-in-law of JOSE MANUEL GALDAMEZ-SERRANO.

(B) From their location in Canada, the defendants, JOSE MANUEL GALDAMEZ-SERRANO, NORVIN GONZALEZ-MORALES, a/k/a "Chico," EMMANUEL ANTONIO GALDAMEZ, and RUBEN ALONZO DAMAS-HERNANDEZ, a/k/a "Alex," offered alien smuggling services to persons living in Canada from foreign countries, including India, Pakistan, and Central and South America, who wished illegally to enter the United States, and to other groups and individuals involved in providing alien smuggling services, such as JATINDER SINGH, a/k/a "Vina." The defendants and other coconspirators knew that these aliens were not lawfully permitted to enter the United States. The aliens would pay amounts of money in the \$1,000's of dollars to their smugglers to be brought into the United States.

(C) Members of the GALDAMEZ organization would sometimes house the aliens at their residences until they were ready to make an attempt to enter the United States.

(D) Members of the GALDAMEZ organization would drive the aliens from Montreal, Quebec, to areas very close to the border between Canada and the United States, sometimes New York but usually Vermont.

(E) Members of the GALDAMEZ organization would guide the aliens across the border into the United States by foot and at night, avoiding roads and official ports of entry.

(F) Once at the border, other coconspirators from Massachusetts, Maryland, New Jersey, New York, and Connecticut, in the United States, who had been recruited by the GALDAMEZ organization, would pick up the aliens near the United States/Canada border, and drive them to, among other places, New York City and Boston, Massachusetts.

(G) Over the course of the conspiracy, the Galdamez organization smuggled more than one hundred (100) illegal aliens into the United States.

(8 U.S.C. §§ 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(i), 1324(a)(1)(A)(ii))

COUNT TWO

The Grand Jury charges:

On or about November 7, 2004, in the District of Vermont and elsewhere, the defendants, JOSE MANUEL GALDAMEZ-SERRANO, NORVIN GONZALEZ-MORALES, a/k/a “Chico,” EMMANUEL ANTONIO GALDAMEZ, and RUBEN ALONZO DAMAS-HERNANDEZ, a/k/a “Alex,” knowing or in reckless disregard of the fact that aliens had not received prior official authorization to come to, enter and reside in the United States, did bring such aliens to the United States for the purpose of commercial advantage and private financial gain. The offense involved at least three aliens.

(8 U.S.C. § 1324(a)(2)(B)(ii); 18 U.S.C. § 2)

COUNT THREE

The Grand Jury charges:

On or about January 16, 2006, in the District of Vermont and elsewhere, the defendants, JOSE MANUEL GALDAMEZ-SERRANO, NORVIN GONZALEZ-MORALES, a/k/a “Chico,” EMMANUEL ANTONIO GALDAMEZ, and RUBEN ALONZO DAMAS-HERNANDEZ, a/k/a “Alex,” knowing or in reckless disregard of the fact that aliens had not received prior official authorization to come to, enter and reside in the United States, did bring such aliens to the United States for the purpose of commercial advantage and private financial gain. The offense involved at least three aliens.

(8 U.S.C. § 1324(a)(2)(B)(ii); 18 U.S.C. § 2)

COUNT FOUR

The Grand Jury charges:

On or about June 12, 2006, in the District of Vermont and elsewhere, the defendants, JOSE MANUEL GALDAMEZ-SERRANO, NORVIN GONZALEZ-MORALES, a/k/a “Chico,” EMMANUEL ANTONIO GALDAMEZ, and RUBEN ALONZO DAMAS-HERNANDEZ, a/k/a “Alex,” knowing or in reckless disregard of the fact that aliens had not received prior official authorization to come to, enter and reside in the United States, did bring such aliens to the United States for the purpose of commercial advantage and private financial gain. The offense involved at least three aliens.

(8 U.S.C. § 1324(a)(2)(B)(ii); 18 U.S.C. § 2)

COUNT FIVE

The Grand Jury charges:

On or about November 23, 2006, in the District of Vermont and elsewhere, the defendants, JOSE MANUEL GALDAMEZ-SERRANO, NORVIN GONZALEZ-MORALES, a/k/a "Chico," EMMANUEL ANTONIO GALDAMEZ, RUBEN ALONZO DAMAS-HERNANDEZ, a/k/a "Alex," and JATINDER SINGH, a/k/a "Vina," knowing or in reckless disregard of the fact that aliens had not received prior official authorization to come to, enter and reside in the United States, did bring such aliens to the United States for the purpose of commercial advantage and private financial gain. The offense involved at least three aliens.

(8 U.S.C. § 1324(a)(2)(B)(ii); 18 U.S.C. § 2)

COUNT SIX

The Grand Jury charges:

On or about February 28, 2007, in the District of Vermont and elsewhere, the defendants, JOSE MANUEL GALDAMEZ-SERRANO, NORVIN GONZALEZ-MORALES, a/k/a "Chico," EMMANUEL ANTONIO GALDAMEZ, and RUBEN ALONZO DAMAS-HERNANDEZ, a/k/a "Alex," knowing or in reckless disregard of the fact that aliens had not received prior official authorization to come to, enter and reside in the United States, did attempt to bring such aliens to the United States for the purpose of commercial advantage and private financial gain.

(8 U.S.C. § 1324(a)(2)(B)(ii); 18 U.S.C. § 2)

A TRUE BILL

Thomas D. Anderson (BAM)
THOMAS D. ANDERSON
United States Attorney
Burlington, Vermont
October 4, 2007